



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 25, 2022

BY ECF

Honorable Laura Taylor Swain
Chief United States District Judge
500 Pearl Street
New York, New York 10007

Re: *United States v. Anthony Clarke, a/k/a "Maurice Beecham," 22 Cr. 171 (LTS)*

Dear Chief Judge Swain:

On March 21, 2022, the defendant pled guilty to illegal reentry, in violation of Title 8, United States Code, Sections 1326(a) and (b)(1). The defense requested that sentencing be expedited and that the preparation of a Presentence Investigation Report ("PSR") be waived. The Government did not oppose the request for an expedited sentencing, but the Government opposed the request for a waiver of the PSR. The Court denied the defense's request for a waiver of the PSR and scheduled sentencing for Friday, May 13, 2022, with the Government's sentencing submission due April 29, 2022.

The United States Probation Office ("Probation") has informed the Government that it anticipates disclosing the PSR on Friday, May 6, 2022—that is, after the Government's sentencing submission is due. The Government anticipates that the PSR, including Probation's recommendation, will be important to the Government's formulation of its sentencing position.

Accordingly, the Government respectfully requests that it be permitted to submit its sentencing submission by Monday, May 9, 2022. The defense does not object to this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Martin S. Cohen, Esq. (by ECF)